

# EXHIBIT 2

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

*Walters v. City of Flint et al.*,

No. 5:17-cv-10164

Hon. Judith E. Levy

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**BELLWETHER PLAINTIFFS' REQUEST FOR PRODUCTION OF DOCUMENTS TO  
DEFENDANTS VEOLIA NORTH AMERICA, LLC, VEOLIA NORTH AMERICA INC.,  
AND VEOLIA WATER NORTH AMERICA OPERATING SERVICES, LLC**

Pursuant to Federal Rule of Civil Procedure 34(a), Bellwether Plaintiffs ("Plaintiffs") hereby request Defendants Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC ("the VNA Defendants") produce all of the following documents and tangible things for inspection and copying or photographing at the offices of LEVY KONIGSBERG, LLP, 605 Third Avenue, 33rd Floor, New York, New York 10158 on December 5, 2021.

**DEFINITIONS**

The terms "VNA Defendants" shall mean Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC.

**NOTE**

Plaintiffs reminds the VNA Defendants of their obligation to produce not only documents that are within their actual possession but also those that are within their control, including those which they have a legal or contractual right to obtain from the person with actual possession or custody of them and those which they can make available to Plaintiffs by providing a suitable

authorization for release of them to Plaintiffs' Counsel. These requests shall all be understood to seek not only hard copy documents but also electronically kept documents.

### **REQUESTS**

#### **REQUEST NO. 1:**

All pleadings, filings, briefs, transcripts, electronic materials, stipulations, settlements, agreements, discovery productions provided, discovery obtained, arbitration documents, and all other materials related to the Pittsburgh Water and Sewer Authority's ("PWSA") arbitration action against Veolia North America-Northeast LLC, which was commenced on or about October 12, 2016 before the American Arbitration Association.

#### **REQUEST NO. 2:**

All correspondence, communications, documents, draft reports, contracts, electronic materials, recordings, slides, presentations, accumulated data, testing results and all other materials related to Veolia North America-Northeast LLC's service as a consultant for the PWSA, including any consulting related to treatment and operations, recommendations, potential cost savings opportunities, and any other information related to corrosion control.

#### **REQUEST NO. 3:**

All correspondence, communications, documents, draft reports, contracts, electronic materials, recordings, slides, presentations, accumulated data, testing results and all other materials related to the VNA Defendants' service as a consultant for General Motors.

Dated: November 8, 2021

Respectfully submitted,

/s/ Corey M. Stern

Corey M. Stern

Renner K. Walker

**LEVY KONIGSBERG LLP**

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**CERTIFICATE OF SERVICE**

I, Corey M. Stern, certify that I served the within BELLWETHER PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS VEOLIA NORTH AMERICA, LLC, VEOLIA NORTH AMERIC INC., AND VEOLIA WATER NORTH AMERICA OPERATING SERVICES, LLC on November 8, 2021 to the VNA Defendants' counsel of record by electronic mail.

/s/ Corey M. Stern  
Corey M. Stern